

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BMS ENTERTAINMENT/HEAT MUSIC LLC, :
ALDEEN WILSON, THEODORE GREEN, :
RAHMID BROWN, RONIQUÉ THOMAS :

Plaintiff, :

v. :

CHRISTOPHER BRIDGES, KANYE WEST, EMI :
APRIL MUSIC, INC., a Connecticut Corporation, :
LUDACRIS MUSIC PUBLISHING, INC., YE :
WORLD MUSIC, UNIVERSAL MUSIC GROUP, :
a Corporation, UNIVERSAL MUSIC :
AND VIDEO DISTRIBUTION CORP., :
a California Corporation, And JOHN DOE :
DEFENDANTS 1-100 :

Defendants. :
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CASE NO. 04 Civ. 02584 (PKC)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed Affidavit of Justin N. Kattan and the exhibits annexed thereto, and the accompanying Memorandum of Law, defendants Christopher Bridges (p/k/a Ludacris), Ludacris Music Publishing, Inc., and EMI April Music Inc. will move before the Honorable Judge P. Kevin Castel, United States Judge for the Southern District of New York, on such date as will be determined by the Court, pursuant to Federal Rule of Civil Procedure 37(b) and (c), and this Court's March 22, 2005 Order, to preclude Plaintiffs from introducing expert reports and testimony of Judith Finell, based on Plaintiffs' repeated violations

of Court Orders and willful misconduct throughout expert discovery, and awarding such other and further relief as the Court deems just and proper.

Dated: New York, New York
April 5, 2005

SONNENSCHN NATH & ROSENTHAL LLP

By: 

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